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September 6, 2024

VIA ECF

Honorable Judge Marcia M. Henry
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Government Employees Ins. Company, et al. v. Gary Grody a/k/a Lance Grody et al*
Case No. 1:24-cv-04125(FB)(MMH)
RR File No.: 005100-03548

Dear Judge Henry:

As you know, we represent Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company, and GEICO Casualty Co. (collectively, "Plaintiffs") in connection with the above-referenced litigation.

Plaintiffs respectfully submit this joint letter motion in accordance with Rule III.C.2 of Your Honor's individual rules and on behalf of all parties regarding the Protective Order in this matter. Plaintiffs and counsels for Defendants Alex Puzaitzer, Lilia Ishvan, AVL Capital LLC, Raritan Billing Corp., Arthur Gitlevich, and AK Best Inc. (the "Appearing Defendants") met and conferred, and consent to the proposed changes. The parties believe additional language is required due to the circumstances of the case, specifically GEICO's intention to produce large volumes of insurance company files which include, among other documents, patient records, attorney-client communications, and attorney work-product (the "Claim Files"). This language provides additional details on the protections afforded to the Claim Files and Patient Files consistent with the other language in the form Protective Order. Defendants Lilia Ishvan, AVL Capital LLC and Raritan Billing Corp. believe additional language is also necessary to protect the investors, and they request that "funder lists" be included in the non-exhaustive list of Commercial Information relating to any party's business. Attached is a clean copy of the proposed Protective Order (Ex. "1") and the redlined comparison between the proposed order and the form Protective Order (Ex. "2").

We thank the Court for its time and continuing attention to this matter.

Respectfully submitted,
RIVKIN RADLER LLP

/s/ Joanna Rosenblatt

Joanna Rosenblatt

cc: All counsel via ECF